

October 21, 2005

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
PO Box 2148
Salem OR 97308-2148

Re: In the Matter of an Investigation Relating to Electric Utility Purchases from
Qualifying Facilities
OPUC Docket No. UM 1129

Attention Filing Center:

Enclosed for filing in the above-captioned docket is Portland General Electric's
Comments Regarding Staff's Revised Consolidated Issues Lists. This document is being filed by
electronic mail with the Filing Center.

An extra copy of this cover letter is enclosed. Please date stamp the extra copy and return
it to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

/S/ J. RICHARD GEORGE

JRG:am

cc: UM 1129 Service List

Enclosure

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused to be served the foregoing REQUEST FOR CHANGE TO SERVICE LIST OF PORTLAND GENERAL ELECTRIC COMPANY filed in OPUC Docket No. UM 1129 by depositing a true and accurate copy with the U.S. Postal Service, posted prepaid and properly addressed to the persons shown on the attached official service list in this proceeding.

Dated this 21st day of October, 2005.

/S/ J. RICHARD GEORGE

J. Richard George, OSB No. 97469
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UM 1129
Service List

RANDY ALLPHIN IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707-0070	MICK BARANKO DOUGLAS COUNTY FOREST PRODUCTS PO BOX 848 WINCHESTER OR 97495
R THOMAS BEACH -- CONFIDENTIAL CROSSBORDER ENERGY 2560 NINTH ST, STE 316 BERKELEY CA 94710	LAURA BEANE PACIFICORP 825 MULTNOMAH STE 800 PORTLAND OR 97232-2153
LOWREY R. BROWN TIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205-3404	KARL BOKENKAMP IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707-0070
JOANNE M BUTLER IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707-0070	BRIAN COLE SYMBIOTICS, LLC PO BOX 1088 BAKER CITY OR 97814
BRUCE CRAIG ASCENTERGY CORP 440 BENMAR DR STE 2230 HOUSTON TX 77060	RANDY CROCKET D.R. JOHNSON LUMBER COMPANY PO BOX 66 RIDDLE OR 97469
CHRIS CROWLEY COLUMBIA ENERGY PARTNERS PO BOX 1000 LA CENTER WA 98629	DATA REQUEST RESPONSE CENTER PACIFICORP 825 NE MULTNOMAH, SUITE 800 PORTLAND OR 97232
CAREL DE WINKEL OREGON DEPARTMENT OF ENERGY 625 MARION STREET NE SALEM OR 97301	JIM DEASON ATTORNEY AT LAW 521 SW CLAY ST STE 107 PORTLAND OR 97201-5407
CRAIG DEHART MIDDLEFORK IRRIGATION DISTRICT PO BOX 291 PARKDALE OR 97041	ELIZABETH DICKSON HURLEY, LYNCH & RE, PC 747 SW MILL VIEW WAY BEND OR 97702

JASON EISDORFER CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205	JOHN M ERIKSSON STOEL RIVES LLP 900 SW FIFTH AVENUE, SUITE 2600 PORTLAND OR 97204-1268
RANDALL J FALKENBERG RFI CONSULTING INC PMB 362 8351 ROSWELL RD ATLANTA GA 30350	JAMES F FELL STOEL RIVES LLP 900 SW 5TH AVE STE 2600 PORTLAND OR 97204-1268
JOHN R GALE IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707-0070	PAUL WOODIN WESTERN WIND POWER 282 LARGENT LN GOLDENDALE WA 98620-3519
THOMAS M GRIM CABLE HUSTON BENEDICT ET AL 1001 SW FIFTH AVE STE 2000 PORTLAND OR 97204-1136	DAVID HAWK J R SIMPLOT COMPANY PO BOX 27 BOISE ID 83707
STEVEN C JOHNSON CENTRAL OREGON IRRIGATION DISTRICT 2598 NORTH HIGHWAY 97 REDMOND OR 97756	BARTON L KLINE IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707-0070
BRUCE A WITTMANN WEYERHAEUSER MAILSTOP: CH 1K32 PO BOX 9777 FEDERAL WAY WA 98063-9777	ALAN MEYER -- CONFIDENTIAL WEYERHAEUSER COMPANY 698 12TH STREET, SUITE 220 SALEM OR 97301-4010
MONICA B MOEN IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707-0070	THOMAS H NELSON THOMAS H NELSON & ASSOCIATES 825 NE MULTNOMAH STE 925 PORTLAND OR 97232
JANET L PREWITT DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096	LISA F RACKNER ATER WYNNE LLP 222 SW COLUMBIA ST STE 1800 PORTLAND OR 97201-6618

<p>PETER J RICHARDSON RICHARDSON & O'LEARY PO BOX 7218 BOISE ID 83707</p>	<p>IRION SANGER DAVISON VAN CLEVE 333 SW TAYLOR, STE 400 PORTLAND OR 97204</p>
<p>LISA C SCHWARTZ PUBLIC UTILITY COMMISSION OF OREGON PO BOX 2148 SALEM OR 97308-2148</p>	<p>MARK TALLMAN PACIFICORP 825 MULTNOMAH STE 800 PORTLAND OR 97232-2153</p>
<p>S BRADLEY VAN CLEVE DAVISON VAN CLEVE PC 333 SW TAYLOR, STE 400 PORTLAND OR 97204</p>	<p>MICHAEL T WEIRICH -- DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096</p>
<p>LINDA K WILLIAMS KAFOURY & MCDUGAL 10266 SW LANCASTER RD PORTLAND OR 97219-6305</p>	

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1129

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	COMMENTS OF PORTLAND
OREGON)	GENERAL ELECTRIC COMPANY
)	REGARDING STAFF'S REVISED
Staff's Investigation Relating to Electric Utility)	CONSOLIDATED ISSUES LISTS
Purchases From Qualifying Facilities)	

I. Introduction

Portland General Electric Company (“PGE”) hereby submits comments regarding the Consolidated Issues lists distributed by Public Utility Commission of Oregon Staff (“Staff”) on October 11, 2005. Our comments on issues are divided to reflect the two issues lists (Phase I – Compliance and Phase II).

II. Phase I Compliance Investigation Issues List:

PGE filed on October 12, 2005, Advice 05-16, which corrects a typographical error and provides necessary clarification as identified in issues 28 and 29. We recommend removing these two issues from the Phase I issues list, subject to approval by the Commission of the above-referenced advice filing.

Issues 1, 2 and 3 are not necessary as they restate the broad purpose of the Phase I investigation.

Further, we observe that the extensive consolidated Phase I issues list prepared by Staff from parties’ submittals (resulting from the July 12 utility compliance filings) includes more than 80 separate items. With such an extensive list, we suggest that the Commission consider

requiring parties to categorize issues to assist in understanding the basis for and nature of each issue. We suggest the following categorization:

- Priority A Issues: The issue addresses a specific element in a compliance filing that the party believes does not comply with a provision in the Order No. 05-584 (“Order”).
- Priority B Issues: The issue is based on an interpretation of one or more provisions of the Order relative to specific terms and conditions in the rate schedule, standard contract or the basis for avoided costs.
- Priority C Issues: The issue proposes new terms or conditions or other requirements not directly required or addressed by the Order or utility compliance filing, or the issue challenges elements of the order.

We believe that if there are issues in the Priority A category, they should be the focus of the Phase I investigation.

Priority B issues include issues that raise questions of “what is reasonable” such as Issues 5, 7, 9, 11 and others which will require consideration in the context of the overall standard contract and tariff provisions to assure contract consistency and maintaining compliance with the Order. While PGE does not object to consideration these types of issues, the value of changing a provision needs to be justified relative to the Order and impact on the overall standard contract and avoided costs.

Issues that present alternative structures or changes to the Order, such as Issue 10, are Priority C and should be more properly addressed within the Phase II track where the record can be more thoroughly developed.

III. Phase II Issues Lists

We do not support Staff's timing proposal regarding issues 2 and 6 (per the footnote on the October 11, 2005 Consolidated Issues List, which states, "Staff proposes to address issues 2 and 6 on the same schedule as the phase I compliance investigation. Therefore, staff did not include these items in its proposed consolidated list of issues for that investigation."). These two issues are by the Order part of Phase II, not the compliance investigation. To initiate a separate Phase II track parallel to the compliance review track for a subset of issues may disadvantage or confuse the development of a complete record for issues in both the compliance review and Phase II.

Also, we clarify that issues 4 and 10 are part of the Commission-directed issues set forth in the Order.

DATED this 21st day of October, 2005.

Respectfully submitted,

/S/ J. RICHARD GEORGE

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